

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

REBECCA FRANCESCATTI, an individual,

Plaintiff,

v.

STEFANI JOANNE GERMANOTTA, an
individual, a.k.a. "Lady Gaga," INTERSCOPE
RECORDS, UNIVERSAL MUSIC GROUP,
INC., DJ WHITE SHADOW, LLC, and
BRIAN JOSEPH GAYNOR, an individual,

Defendants.

Case No. 1:11-cv-5270

JURY TRIAL DEMANDED

Judge Blanche M. Manning
Mag. Judge Jeffrey T. Gilbert

PLAINTIFF'S MOTION FOR LEAVE TO FILE UNDER SEAL

Plaintiff, Rebecca Francescatti respectfully moves this Court for leave to file under seal the following documents:

1. Plaintiff's Response to Defendant's L.R. 56.1 Statement of Undisputed Facts in Support of Their Motion for Summary Judgment and Plaintiff's L.R. 56.1 Statements of Additional Fact;
2. Exhibits A, B, C, E, F, J, K, M, N, BB, CC, DD, EE, JJ, PP to Plaintiff's Response;
3. Exhibit QQ - Confidential Summary Judgment Disc containing Confidential Video Files 1, 2, and 3 and Audio Track 1;
4. Plaintiff's Memorandum in Opposition to Defendants' Motion for Summary Judgment;

Where possible, redacted public versions of these documents were filed on April 10, 2013. Unredacted copies will be delivered to counsel for all parties and to chambers.

The parties to this proceeding are subject to a Protective Order regarding certain Confidential information, which order was entered by the Court on February 15, 2012 and

provides, among other things, that if a party wishes to use any confidential information in Court papers, such confidential information shall be maintained under seal by the clerk.

These documents have been designated as, or cite and/or refer to, information that has been designated as either (a) "Confidential" or (b) "Highly Confidential – Attorneys Eyes Only." Accordingly, Plaintiff respectfully requests that the Court permit these documents to be filed under seal.

Dated: March 4, 2013

Respectfully submitted,

/s/ William L. Niro

William L. Niro

Christopher W. Niro

NIRO, HALLER & NIRO

181 W. Madison, Suite 4600

Chicago, IL 60602

Tel. (312) 236-0733

Fax: (312) 236-3137

wniro@nshn.com

cniro@nshn.com

Attorneys for Plaintiff, Rebecca Francescatti

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 10, 2013 the foregoing

PLAINTIFF'S MOTION FOR LEAVE TO FILE UNDER SEAL

was filed with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to the following counsel of record.

Steven R. Gilford
Catherine J. Spector
PROSKAUER ROSE LLP
70 West Madison St., Suite 3800
Chicago, IL 60602
Tel: (312) 962-3550
Fax: (312) 962-3551
sgilford@proskauer.com
cspector@proskauer.com

Charles Ortner
Sandra A. Crawshaw-Sparks
PROSKAUER ROSE LLP
Eleven Times Square
New York, NY 10036
Tel: (212) 969-3000
Fax: (212) 969-2900
cortner@proskauer.com
scrawshaw@proskauer.com
Attorneys for Stefani Joanne Germanotta

John J. Bullaro, Jr.
Bryan E. Curry
BULLARO & CARTON PC
200 North LaSalle St., Suite 2420
Chicago, IL 60601
Tel: (312) 831-1000
Fax: (312) 831-0647
jbullaro@bullarocarton.com
bcurry@bullarocarton.com
Attorneys for Brian Joseph Gaynor

Christopher B. Lay
JENNER & BLOCK LLP
353 N. Clark Street
Chicago, IL 60654
Tel: (312) 840-7295
Fax: (312) 840-7395
clay@jenner.com

Andrew H. Bart
JENNER & BLOCK LLP
919 Third Avenue – 37th Floor
New York, NY 10022-3908
Tel: (212) 891-1600
Fax: (212) 891-1699
abart@jenner.com
Attorneys for UMG Recordings, Inc.

Elvis D. Gonzalez
ELVIS GONZALEZ, LTD.
Three First National Plaza
70 West Madison St., Suite 1515
Chicago, IL 60602
Tel: (312) 558-9779
Fax: (312) 276-8119
egonzalez@elvisgonzalezltd.com
Attorney for DJ White Shadow, LLC

/s/ William L. Niro
Attorneys for Rebecca Francescatti